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COUNSEL FOR THE DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
WEST HOUSTON MEMORY CARE, LLC,¹	§	Case No. 19-31485-sgj-11
	§	
Debtor.	§	

DEBTOR'S WITNESS AND EXHIBIT LIST

Pursuant to Local Rule 9014-1(c), West Houston Memory Care, LLC (the "Debtor"), a debtor and debtor-in-possession in the above-referenced chapter 11 case, hereby files this Witness and Exhibit List, and designates the following witnesses and exhibits for use in connection with the WebEx video conference hearing to be conducted on December 22, 2020 at 2:30 p.m. to consider the following:

- *Motion for Order (A) Authorizing Sale of Assets Free and Clear of All Liens, Claims, and Encumbrances, Subject to Higher and Better Offers, and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 34] (the "Sale Motion").*

¹ Last four EIN 2760.

WITNESSES

Debtor may call any one or more of the following witnesses at the Hearing:

<u>No.</u>	<u>Name</u>
1.	Karen Nicolaou, Debtor's Chief Restructuring Officer
2.	Josh Rosen, Principal, McFarlin GP Invest, LP
3.	Matt Johnson, Principal, McFarlin GP Invest, LP
4.	All witnesses to be identified during ongoing discovery and not otherwise objected to by Debtor
5.	All witnesses listed by any other party, whether or not called to testify, and not otherwise objected to Debtor
6.	All witnesses needed to authenticate or identify exhibits
	Debtor reserves the right to amend and supplement this witness list.

EXHIBITS

Debtor may use one or more of the following exhibits at the Hearing:

<u>No.</u>	<u>Description</u>
1.	Asset Purchase Agreement [Dkt. No. 34 - EX. A]
2.	Budget [Dkt. No. 34 - EX. B]
3.	Affidavit of Service [LaSalle Dkt. No. 257]
4.	Affidavit of Service
	Any exhibit listed by any other party
	Rebuttal exhibits
	Debtor reserves the right to amend and supplement this exhibit list.

RESERVATION OF RIGHTS

The foregoing witness and exhibit list is being submitted based on information reasonably available to the Debtor at this time and without waving any objection as to relevance, materiality, or admissibility of evidence in this litigation. Debtor reserves the right at any time to revise, correct, supplement or clarify this witness and exhibit list.

Dated: December 18, 2020

CROWE & DUNLEVY, P.C.

By: /s/ Vickie L. Driver

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon all parties receiving notice via the Court's ECF noticing system on this the 18th day of December, 2020.

/s/ Vickie L. Driver
Vickie L. Driver